

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of SAN DIEGO GAS & ELECTRIC  
COMPANY under the Catastrophic Event  
Memorandum Account (CEMA) for Recovery of  
costs related to the 2003 Southern California  
Wildfires. (U 902-M)

Application 04-06-035  
(Filed June 28, 2004)

**ADMINISTRATIVE LAW JUDGE'S RULING  
REQUIRING SAN DIEGO GAS AND ELECTRIC COMPANY  
TO PROVIDE FURTHER INFORMATION  
TO SUPPLEMENT ITS APPLICATION**

**Background**

On June 28, 2004 San Diego Gas & Electric Company (SDG&E) filed an application to recover \$37.6 million, the California jurisdictional costs associated with the 2003 Southern California Wildfires (Wildfires) applicant believes to be in conformance with its Catastrophic Even Memorandum Account (Memo Account) as authorized in its Preliminary Statement.

**Additional Information Required**

Based upon a review of the application and the supporting exhibits, the assigned Administrative Law Judge (ALJ) has determined that the application as filed does not provide sufficient information for the Commission to determine whether the request is reasonable and supported by the evidence. Accordingly, to allow for a full and fair review of the applicant's request, the application must be supplemented. All deficiencies relate to the Prepared Direct Testimony of Cheryl A. Shepherd.

1. On page 3, line 25, reference is made to two (2) work orders, 1000911 and 5000911. These work orders should be included along with any further descriptions or supporting information to fully explain their scope.
2. On page 4, lines 1-6, reference is made to eleven (11) additional work orders. These work orders should be included along with any further descriptions or supporting information to fully explain their scope. Additionally, there should be a complete accounting of the costs included in each work order in a manner similar to Exhibit D.
3. On page 4 lines 11-16, reference is made to an accounting procedure. Exhibit C appears to be only the most minimal portion of the communications implied in the testimony. A complete copy of all accounting instructions applicable to the Wildfires' Memo Account should be included along with any further descriptions or supporting information to fully explain their scope.
4. On page 6, lines 3-12, (amongst other references) SDG&E cites that recorded costs through May 31, 2004 total \$66.4 million, \$58.0 million of which are California-jurisdictional. A detailed accounting, with citations to appropriate authority, should be included along with any further descriptions or supporting information to fully explain the calculation of the jurisdictional split.
5. On page 6, lines 11-12, SDG&E cites that \$37.6 million of the \$58.0 million costs are "incremental" to existing costs of \$20.4 million included in rates. There is no analysis in support of this split. A detailed accounting, with citations to appropriate authority, should be included along with any further descriptions or supporting information to fully explain the calculation of the \$20.4 million non-incremental costs.
6. On pages 7, lines 22-29, page 11, lines 9-11 and lines 12-14, and page 14 line 14, the testimony contains inconsistent descriptions of "overhead" costs. Additionally, the application does not contain a detailed accounting of

overheads in total or by work order. Exhibit D contains only aggregate overhead totals. A detailed accounting, with citations to appropriate authority or sources, should be included along with any further descriptions or supporting information to fully explain the accrual of all overheads and the justification for the accrual as “incremental”. Each specific overhead component should be addressed individually.

All responses should be provided in the form of testimony and sponsored by an appropriate witness, served in hard copy and electronic form to the ALJ. Responses shall also be served on the parties who received notice of A.04-06-035. Electronic responses to the ALJ should be in fully functional Microsoft Excel or Word files. All responses should be provided as soon as practicable. As appropriate, additional references may be provided to exhibits already served in the application.

**IT IS RULED** that:

1. San Diego Gas & Electric Company (SDG&E) shall respond to the six deficiencies in Application 04-06-035 as identified in this Ruling.
2. SDG&E shall electronically serve the responses on the service list in A.02-12-28 used for the initial filing of this proceeding and provide both hard copy and functional electronic form responses to the assigned Administrative Law Judge.

Dated July 14, 2004, at San Francisco, California.

/s/ Douglas M. Long  
Douglas M. Long  
Administrative Law Judge

**CERTIFICATE OF SERVICE**

I certify that I have by mail this day served a true copy of the original attached Administrative Law Judge's Ruling Requiring San Diego and Electric Company to Provide Further Information to Supplement its Application on all parties of record in this proceeding or their attorneys of record.

Dated July 14, 2004, at San Francisco, California.

/s/ Antonina V. Swansen  
Antonina V. Swansen

**N O T I C E**

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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